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# EXHIBIT A

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

THE TRUSTEES OF  
PURDUE UNIVERSITY,

Plaintiff,

v.

STMICROELECTRONICS N.V.,  
STMICROELECTRONICS  
INTERNATIONAL N.V., and  
STMICROELECTRONICS, INC.,

Defendants.

Civil Action No. 6:21-cv-00727-ADA

JURY TRIAL DEMAND

**DECLARATION OF SAMUEL E. JOYNER**

I, Samuel E. Joyner, make this declaration in support of Purdue's Motion for Leave to Effect Alternative Service as follows:

1. My name is Samuel E. Joyner. I am more than twenty-one years old, of sound mind, and fully capable of making this declaration. I am a graduate of the U.S. Military Academy at West Point, New York. Before attending law school, I served in the U.S. Army as an Airborne Infantry Ranger. I was honorably discharged from active duty service as a Captain. I have never been convicted of a felony or misdemeanor involving moral turpitude. I was conferred the degree of Doctor of Jurisprudence from The University of Tulsa College of Law in 2002, and I received my license from the State Bar of Texas in November 2002. I am a partner at the law firm of Shore Chan LLP in Dallas, Texas, and one of the attorneys representing Plaintiff Trustees of Purdue University ("Purdue") in an action styled *The Trustees of Purdue University v. STMicroelectronics N.V. et al.*, No. 6:21-cv-00727-ADA, in the U.S. District Court for the Western District of Texas,

Waco Division. I have personal knowledge of the facts set forth in this declaration and am competent to testify thereto.

2. On October 25, 2021, Purdue filed its First Amended Complaint for Patent Infringement (ECF No. 27) in the above-referenced action (“First Amended Complaint”). Subsequently, the Clerk of Court issued a Summons in the above-referenced action addressed to STMicroelectronics International N.V. (ECF No. 29) (“Summons”).

3. On October 27, 2021, I emailed Bruce S. Sostek, lead counsel for Defendants STMicroelectronics N.V. and STMicroelectronics, Inc. in the above-referenced action, to inquire (1) whether he was authorized to accept service of the First Amended Complaint and Summons on Defendant STMicroelectronics International N.V.’s behalf and, if not, (2) whether STMicroelectronics International N.V. would agree to waive service under Federal Rule of Civil Procedure 4(d). A true and correct copy of my October 27, 2021 email is contained in the email string attached hereto as Exhibit 1.

4. On October 28, 2021 at 8:46am, I called Mr. Sostek’s direct office number (214-969-1234) to follow up on my October 27, 2021 email referenced above. I left Mr. Sostek a voice message regarding same because no one answered my call. On the same day at 9:04am, I sent Mr. Sostek the following email:

Hi Bruce,

I just left you a voicemail regarding my email below. Given the attached email Justin sent last night at 11:12pm informing me that Defendants intend to file a supplemental CRSR today, an answer to my questions is needed for Purdue’s section of the supplemental CRSR. If you are not authorized to accept service and STMicroelectronics International N.V.’s will not waive service (or you don’t know whether it would), Purdue will file a motion seeking the Court’s permission to serve STMicroelectronics International N.V. through an alternative means of service. Unless you say otherwise, I’ll indicate in my Certificate of Conference that Defendants oppose Purdue’s motion.

If you have any questions, or would like to discuss by telephone or videoconference, please let me know.

Thanks,  
Sam

A true and correct copy of my October 28, 2021 email is contained in the email string attached hereto as Exhibit 1.

5. On October 28, 2021 at 1:50pm, Mr. Sostek replied to my October 28 email reference above as follows:

Sam,

In response to your inquiry, neither I nor my firm has been engaged to represent ST International NV in this matter. Accordingly, I am not authorized to accept service on behalf of ST International or to agree (or not agree) to waive service.

Regards,  
Bruce

A true and correct copy of Mr. Sostek's October 28, 2021 email is contained in the email string attached hereto as Exhibit 1.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 the foregoing is true and correct to the best of my knowledge. Executed on October 28, 2020 in Dallas, Texas.



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Samuel E. Joyner

# Exhibit 1

## Sam Joyner

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**From:** Sostek, Bruce S (DAL - X61234) <Bruce.Sostek@hklaw.com>  
**Sent:** Thursday, October 28, 2021 1:50 PM  
**To:** Sam Joyner; Michael Shore  
**Cc:** Wynne, Richard L (DAL - X61386); Cohen, Justin S (DAL - X61211); Haghighatian, Nadia E (DAL - X61261); Alfonso Chan; Mark Siegmund  
**Subject:** RE: Purdue v. STMicroelectronics N.V. et al., No. 6:21-cv-00727-ADA (W.D. Tex.)--Service of First Amended Complaint on STMicroelectronics International N.V.

**CAUTION: External Email!**

Sam,  
In response to your inquiry, neither I nor my firm has been engaged to represent ST International NV in this matter. Accordingly, I am not authorized to accept service on behalf of ST International or to agree (or not agree) to waive service.

Regards,  
Bruce

**Bruce Sostek | Holland & Knight**

Partner

Holland & Knight LLP

One Arts Plaza, 1722 Routh Street, Suite 1500 | Dallas, Texas 75201

Phone 214.969.1234 | Mobile 214.244.4347

[bruce.sostek@hklaw.com](mailto:bruce.sostek@hklaw.com) | [www.hklaw.com](http://www.hklaw.com)

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[Add to address book](#) | [View professional biography](#)

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**From:** Sam Joyner <sjoyner@shorechan.com>  
**Sent:** Thursday, October 28, 2021 9:04 AM  
**To:** Sostek, Bruce S (DAL - X61234) <Bruce.Sostek@hklaw.com>  
**Cc:** Wynne, Richard L (DAL - X61386) <Richard.Wynne@hklaw.com>; Cohen, Justin S (DAL - X61211) <Justin.Cohen@hklaw.com>; Haghighatian, Nadia E (DAL - X61261) <Nadia.Haghighatian@hklaw.com>; Alfonso Chan <achan@shorechan.com>; Mark Siegmund <mark@swclaw.com>  
**Subject:** RE: Purdue v. STMicroelectronics N.V. et al., No. 6:21-cv-00727-ADA (W.D. Tex.)--Service of First Amended Complaint on STMicroelectronics International N.V.

*[External email]*

Hi Bruce,

I just left you a voicemail regarding my email below. Given the attached email Justin sent last night at 11:12pm informing me that Defendants intend to file a supplemental CRSR today, an answer to my questions is needed for Purdue's section of the supplemental CRSR. If you are not authorized to accept service and STMicroelectronics International N.V.'s will not waive service (or you don't know whether it would), Purdue will file a motion seeking the Court's permission to serve STMicroelectronics

International N.V. through an alternative means of service. Unless you say otherwise, I'll indicate in my Certificate of Conference that Defendants oppose Purdue's motion.

If you have any questions, or would like to discuss by telephone or videoconference, please let me know.

Thanks,  
Sam

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**From:** Sam Joyner  
**Sent:** Wednesday, October 27, 2021 2:11 PM  
**To:** Sostek, Bruce S (DAL - X61234) <[Bruce.Sostek@hklaw.com](mailto:Bruce.Sostek@hklaw.com)>  
**Cc:** Wynne, Richard L (DAL - X61386) <[Richard.Wynne@hklaw.com](mailto:Richard.Wynne@hklaw.com)>; Cohen, Justin S (DAL - X61211) <[Justin.Cohen@hklaw.com](mailto:Justin.Cohen@hklaw.com)>; Haghghatian, Nadia E (DAL - X61261) <[Nadia.Haghghatian@hklaw.com](mailto:Nadia.Haghghatian@hklaw.com)>; 'Alfonso G. Chan' <[achan@ShoreChan.com](mailto:achan@ShoreChan.com)>; Mark Siegmund <[mark@swclaw.com](mailto:mark@swclaw.com)>  
**Subject:** Purdue v. STMicroelectronics N.V. et al., No. 6:21-cv-00727-ADA (W.D. Tex.)--Service of First Amended Complaint on STMicroelectronics International N.V.

Hi Bruce,

I'm reaching out to inquire whether you are authorized to accept service, on behalf of STMicroelectronics International N.V., of the attached (1) First Amended Complaint for Patent Infringement and (2) Summons. If not, will you please let me know if STMicroelectronics International N.V. will agree to waive service under Federal Rule of Civil Procedure 4(d).

Thank you,  
Sam

**Samuel E. Joyner**  
*Partner*



214.593.9124 | c 214.923.1543  
[sjoyner@shorechan.com](mailto:sjoyner@shorechan.com) | [shorechan.com](http://shorechan.com)

Shore Chan LLP  
901 Main Street | Suite 3300 | Dallas, Texas 75202

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